

1 Benjamin K. Riley (SBN 112007)
Helen C. MacLeod (206618)

2 **HOWREY LLP**

525 Market Street, Suite 3600
3 San Francisco, California 94105
Telephone: (415) 848-4900
4 Facsimile: (415) 848-4999

5 Stephen D. Libowsky (*pro hac vice* to be submitted)

HOWREY LLP

321 North Clark Street, Suite 3400
6 Chicago, IL 60610
Telephone: (312) 595-1239
7 Facsimile: (312) 595-2250

8 Attorneys for Defendant

9 ENTERPRISE TRUST COMPANY

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 RUTHE P. GOMEZ,

14 Plaintiff,

15 vs.

16 TRADERIGHT CORP. d/b/a TRADERIGHT
17 SECURITIES, INC., ENTERPRISE TRUST
18 COMPANY, and LOCKE HAVEN, LLC,

19 Defendants.

) Case No. CV 08-0266 (WDB)

) **STIPULATION AND [PROPOSED] ORDER**
) **EXTENDING TIME TO FILE RESPONSE**
) **TO COMPLAINT**

1 Pursuant to Local Rule 6-2, Plaintiff Ruthe P. Gomez, on the one hand, and Defendants
2 Enterprise Trust Company ("Enterprise Trust") and TradeRight Corporation ("TradeRight"), on the
3 other hand, by and through their respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, Ms. Gomez initiated this action in the Superior Court of the State of California in
5 the County of Alameda (Case No. RG 07362098) on or about December 19, 2007;

6 WHEREAS, Enterprise Trust removed this action to this Court on or about January 15, 2008;

7 WHEREAS, on January 16, 2008, TradeRight filed its joinder in Enterprise Trust's removal of
8 this action to this Court;

9 WHEREAS, Ms. Gomez seeks, by this action, to transfer her trust accounts from Enterprise
10 Trust to A.G. Edwards & Sons or other custodians;

11 WHEREAS, the parties are cooperating and working diligently to complete the transfer of Ms.
12 Gomez's accounts within the next three to four weeks;

13 WHEREAS, at present, Enterprise Trust and TradeRight must respond to the Complaint by no
14 later than February 4, 2008;

15 WHEREAS, the Initial Case Management Conference in this action has been set for April 23,
16 2008;

17 WHEREAS, no discovery has yet occurred;

18 WHEREAS, no previous time modifications have been made in this action, whether by
19 stipulation or by Court order;

20 WHEREAS, this stipulated time modification will not have any effect on the schedule for this
21 action;

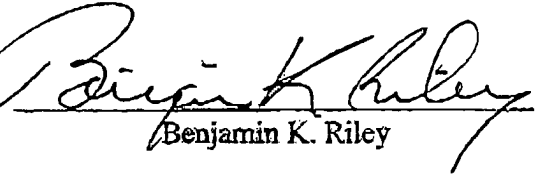
22
23 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned, that

24 1. The time for Enterprise Trust and TradeRight to file a pleading responsive to the
25 Complaint is extended up to and including February 15, 2008.
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1 Dated: January 22, 2008

Respectfully submitted,

2 **HOWREY LLP**

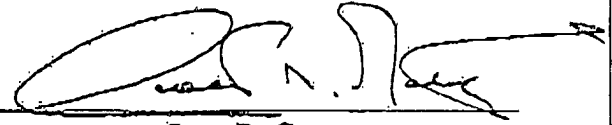
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4 By: 
Benjamin K. Riley

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6 Attorneys for Defendant
ENTERPRISE TRUST COMPANY

7
8 Dated: January 22, 2008

Respectfully submitted,

9 **GATTEY LAW OFFICES**

10
11 By: 
12 Scott D. Gattey

13 Attorneys for Defendant
14 TRADERIGHT CORP., d/b/a
TRADERIGHT SECURITIES, INC.

15
16 Dated: January 22, 2008

Respectfully submitted,

17 **BALDWIN LAW GROUP**

18
19 By: 
20 Patrick Baldwin

21 Attorneys for Plaintiff
22 RUTHE P. GOMEZ

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HOWREY LLP

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS ORDERED that the time for Enterprise Trust and TradeRight to file a pleading responsive to the Complaint is extended up to and including February 15, 2008.

Dated: January __, 2008

The Honorable Wayne D. Brazil
United States Magistrate Judge

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, of the United States District Court for the Northern District of California, the undersigned attests that all parties have concurred in the electronic filing of this Stipulation and [Proposed] Order.

Dated: January 22, 2008

Respectfully submitted,

HOWREY LLP

By: 

Benjamin K. Riley

Attorneys for Defendant
ENTERPRISE TRUST COMPANY